

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
KNEPPER & CLARK LLC  
5510 So. Fort Apache Rd, Suite 30  
Las Vegas, NV 89148  
Phone: (702) 856-7430  
Fax: (702) 447-8048  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Ave., Suite 350  
Las Vegas, NV 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
Email: dkrieger@hainesandkrieger.com

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

PEGGY PRUCHNICKI,

Plaintiff,

vs.

ENVISION HEALTHCARE CORPORATION  
D/B/A ENVISION HEALTHCARE, EMCARE,  
INC., and SHERIDAN HEALTHCORP, INC.,

Defendants.

Case No.: 2:19-cv-01193-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO MOTION TO DISMISS**

**[FIRST REQUEST]**

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STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS  
[FIRST REQUEST] - 1

1 Plaintiff Peggy Pruchnicki (“Plaintiff”), by and through her counsel of record, and  
2 Defendants Envision Healthcare Corporation d/b/a Envision Healthcare (“Envision”), EmCare,  
3 Inc., (“EmCare”) and Sheridan Healthcorp, Inc., (“Sheridan”) (collectively, “Defendants”) have  
4 agreed and stipulated to extend the deadline to respond to Defendants’ Motion to Dismiss the  
5 Complaint [ECF No.18] (the “Motion”) filed on July 9, 2019. Plaintiff’s Response to the Motion  
6 is due August 12, 2019.

8 Plaintiff and Defendants have agreed to extend Plaintiff’s Response deadline in order to  
9 allow Plaintiff’s counsel additional time to address Defendants’ pending motion to dismiss.  
10 Specifically, Plaintiff anticipates seeking leave to file a Second Amended Complaint in response  
11 to Defendants’ Motion. Depending on the changes made to the complaint, Defendants may agree  
12 to stipulate to leave to amend. Plaintiff anticipates circulating a proposed second amended  
13 complaint for Defendants’ review, and an extension will permit Plaintiff sufficient time to draft a  
14 proposed Second Amended Complaint and for Defendants to review the same to determine  
15 whether they can stipulate to its filing. As a result, both Plaintiff and Defendants hereby request  
16 this Court to further extend the date for Plaintiff to respond to Defendants’ Motion to Dismiss  
17 Complaint until **August 23, 2019**. This is the first stipulation for extension of time to respond to  
18 the motion to dismiss.

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28 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS  
[FIRST REQUEST] - 2

This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

Dated August 9, 2019.

**KNEPPER & CLARK LLC**

/s/ Miles N. Clark

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
5510 So. Fort Apache Rd, Suite 30  
Las Vegas, NV 89148  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com

**HAINES & KRIEGER LLC**

David H. Krieger, Esq.  
Nevada Bar No. 9086  
8985 S. Eastern Avenue, Suite 350  
Las Vegas, NV 89123  
Email: dkrieger@hainesandkrieger.com

*Counsel for Plaintiff*

**MCDONALD CARANO LLP**

/s/ Amanda M. Perach

Amanda C. Yen, Esq.  
Nevada Bar No. 9726  
Amanda M. Perach, Esq.  
Nevada Bar No. 12399  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, NV 89102  
Email: ayen@mcdonaldcarano.com  
Email: aperach@mcdonaldcarano.com

**BAKER & HOSTETLER LLP**

Casie D. Collignon, Esq.  
*Admitted Pro Hac Vice*  
Matthew D. Pearson, Esq.  
*Admitted Pro Hac Vice*  
Sean B. Solis, Esq.  
*Admitted Pro Hac Vice*  
1801 California Street, Suite 4400  
Denver, CO 80202-2662  
Email: ccollignon@bakerlaw.com  
Email: mpearson@bakerlaw.com  
Email: ssolis@bakerlaw.com

*Counsel for Defendants*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

August 9, 2019  
Dated: \_\_\_\_\_